

FILED  
UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
CLERK'S OFFICE

2004 JUN 17 P 12:20

Pacific Packaging Products, Inc.

Plaintiff

v.

Baldwin & Clarke,

Jefferson Pilot Securities Corp.,

Benefit Strategies, LLC,

Michael J. Kennedy, and

Scott D. LaValley

Defendants

U.S. DISTRICT COURT  
DISTRICT OF MASS

Civil Action No.: 04-CV-11102MLW

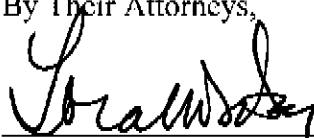
SECOND MOTION OF PLAINTIFF TO EXTEND TIME TO RESPOND  
TO MOTION OF THE DEFENDANTS, BALDWIN & CLARKE,  
JEFFERSON PILOT SECURITIES CORP., MICHAEL J. KENNEDY  
AND SCOTT D. LAVALLEY TO DISMISS  
***WITH ASSENT OF ALL DEFENDANTS' COUNSEL***

Now comes the Plaintiff, Pacific Packaging Products, Inc., with the assent of all Defendants' counsel, and requests this Court grant it an extension of time to respond to the Motion to Dismiss filed by the Defendants up to and including July 23, 2004. As a basis, the Plaintiff states:

1. The parties have been actively exploring a resolution of this matter;
2. Plaintiff's counsel, Lora M. McSherry, is scheduled for vacation beginning June 24, 2004 and will not return to the Commonwealth until July 6, 2004.

Dated: June 16, 2004

Respectfully Submitted,  
Pacific Packaging Products, Inc.  
By Their Attorneys,



Lora M. McSherry, BBO# 551695  
Herbert P. Phillips, BBO# 398420  
Phillips, Gerstein, Holber & Channen, LLP  
25 Kenoza Avenue  
Haverhill, MA 01830  
(978) 374-1131

Assented to by the Attorneys for  
Baldwin & Clarke, Jefferson  
Pilot Securities Corp., Michael J.  
Kennedy and Scott D. LaValley



John D. Hughes, BBO# 234660  
Mark B. Dubnoff, BBO# 637212  
Edwards & Angell, LLP  
101 Federal Street  
Boston, MA 02110  
(617) 439-4444

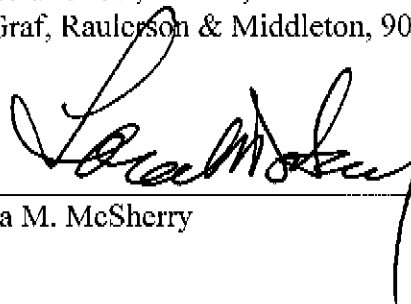
Assented to by the Attorneys for  
Benefit Strategies, Inc.



Anthony S. Augeri  
William Glahn  
McLanc, Graf, Raulerson & Middleton  
900 Elm Street  
Manchester, NH 03105-0326  
(603)628-1248

**CERTIFICATE OF SERVICE**

I, Lora M. McSherry, hereby certify that on this 16<sup>th</sup> day of June, 2004, I caused a copy of the foregoing document to be sent by first-class mail, postage prepaid, to Defendant's counsel, John Hughes, Esq, Edwards & Angell, LLP, 101 Federal Street, Boston, MA 02110 and Anthony S. Augeri, Esq. and William Glahn, Esq. McLane, Graf, Raulerson & Middleton, 900 Elm Street P.O. Box 326 Manchester, NH 03105-0326



Lora M. McSherry